

November 12, 2010

Chip Humphrey
Eric Blischke
U.S. Environmental Protection Agency, Region 10
805 SW Broadway, Suite 500
Portland, OR 97205

**Re: Lower Willamette River, Portland Harbor Superfund Site
USEPA Docket No: CERCLA-10-2001-0240
Monthly Progress Report for October 2010**

Dear Mssrs. Humphrey and Blischke:

This monthly status report provides information required by the Portland Harbor Superfund Site Administrative Settlement and Administrative Order on Consent (ASOC).

1. ACTIONS TAKEN IN OCTOBER 2010

- A request to extend the dispute deadline on EPA's comments on the LWG benthic approach was provided to EPA on October 5, 2010.
- An updated schematic draft Feasibility Study (FS) schedule was provided to EPA on October 6, 2010.
- The list of BHHRA and BERA non-directive comment issues and general responses to EPA non-directive comment key issues on the RI and BHHRA were provided to EPA on October 7, 2010.
- General responses to EPA's non-directive comment key issues on the BERA and Attachment A response to comment 128 TTC and TSC approach were provided to EPA on October 13, 2010.
- A meeting to discuss the non-directive BHHRA, BERA, and RI comments with EPA and DEQ was held on October 15, 2010.
- Tabulated bioassay hit classifications were provided to EPA on October 15, 2010.
- A request to extend the deadline for revising the draft RI and risk assessments was provided to EPA on October 18, 2010.
- An agenda for the October 22 Logistic Regression Model (LRM) meeting was provided to EPA on October 19, 2010.
- A meeting to discuss the LRM was held on October 22, 2010.
- The Evaluation of TBT Risk to Fish in Portland Harbor technical memorandum was provided to EPA on October 28, 2010.

Deliverables Approved by EPA

None.

Deliverables Submitted to EPA

None.

Comments/Documents Provided by EPA

October 8, 2010: EPA provided an extension of the dispute deadline for EPA's benthic approach comments until October 18, 2010.

October 13, 2010: EPA provided an extension of the dispute deadline for EPA's benthic approach comments until November 12, 2010.

October 18, 2010: EPA provided an interim extension to finalize the LWG's response to the non-directive BHHRA, BERA, and RI comments until November 18, 2010.

2. PROBLEMS ENCOUNTERED, ANTICIPATED DELAYS, AND SOLUTIONS

EPA's September 27, 2010 comments on the benthic risk evaluation include an LRM developed by NOAA. Inclusion of the NOAA LRM and EPA's directive comments into the BERA could have significant scope and schedule implications, and the LWG has requested back-up information to understand how the LRM was constructed and to evaluate its reliability. EPA provided an extension of the directive deadline to November 12, 2010. The LWG and EPA met and discussed technical issues associated with the LRM, and are working jointly to resolve a path forward.

3. RESULTS OF SAMPLING, TESTS, AND OTHER DATA RECEIVED

None.

4. SCHEDULE FOR THE NEXT FOUR MONTHS

Work covered by the ASOC that is potentially planned for November and December 2010, and January and February 2011 includes the following:

- November 2010: Alternatives Screening Check-In Materials
- December 2010: Revised Stormwater Loading Calculations Methods Report
- December 1, 2010: Monitored Natural Recovery/Recontamination Modeling Meeting
- December 7, 2010: FS Tools Meeting
- December 14, 2010: Alternatives Screening Check-In

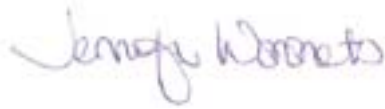
Submittal dates for pending documents currently under preparation by LWG and scheduled for submittal in upcoming months are listed in Table 1 – Status of Active LWG Deliverables – Portland Harbor RI/FS. This table has been reformatted from previously submitted versions to only include pending and recently submitted deliverables for which EPA comments or approvals are required. Table 2 – Status of LWG Deliverables – Portland Harbor RI/FS reflects the more complete list of LWG submittals and is equivalent to the former Table 1 provided in previous progress reports.

5. DOCUMENTS AND ISSUES AWAITING EPA RESPONSE

EPA comments or approvals have not been received on a number of documents that have been submitted to EPA as required by the ASOC; these submittals are listed in Tables 1 and 2. The LWG requests EPA provide document approvals for these submittals to verify that the terms of the ASOC are being met and issues are resolved to maintain progress on the RI/FS. Also, the LWG believes that many of the documents listed as future submittals in Table 2 are no longer needed (see Status/Comments column) and requests that EPA review the list and confirm that these documents are indeed not needed.

If you have any questions, please give me a call at (503) 670-1108.

Sincerely,



Jennifer Woronets
LWG Administrative Project Coordinator

Copies: Jim Anderson, ODEQ (email only)
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Michael Karnosh, Grand Ronde (email only)
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Jennifer Peers, Stratus Consulting (email only)
LWG Management
LWG Repository

Table 1. Status of Active LWG Deliverables - Portland Harbor RI/FS

Deliverable¹	Submittal Deadline²	Status/ Comments	EPA Comments Target Date
<i>None</i>			

Notes:

¹ - **Bolded Deliverables** are primary deliverables per Section XIX., Paragraph 4 of AOC (EPA 2001a).

Unbolded Deliverables are secondary deliverables per Section XIX, Paragraph 5 of AOC.

Italicized Deliverables do not have stipulated penalty amounts.

² - Listed Submittal Deadlines are for draft documents. Unless otherwise specified, all final documents are due to EPA 30 days following receipt of comments from EPA.

Deliverable completed and approved by EPA.

Deliverable submitted to EPA and its partners.

Underlining indicates text change from last progress report.

Table 2. Status of LWG Deliverables - Portland Harbor RI/FS

Deliverable¹	Submittal Deadline²	Status/Comments	EPA Comments Target Date
Round 1			
<i>Compilation of Information for Sources Between RM 11 and 11.6 East Bank of Portland Harbor</i>	November 2007	Submitted to EPA and DEQ 11/21/2007. Need written response from DEQ and EPA that upland sources are under investigation consistent with the Road to the ROD.	
Round 2 Biota			
<i>Revised Round 2 QAPP Addendum 6: Sampling of Benthic Invertebrate Tissue</i>	11/23/2005	Submitted 11/23/2005; approved with conditions on 12/6/2005; a final QAPP addendum is required	12/8/2005
<i>Final Round 2 QAPP Addendum 6: Sampling of Benthic Invertebrate Tissue</i>	TBD	On 2/9/2006, the LWG submitted a response to EPA's comments on the 11/23/2005 version of the QAPP addendum. The LWG has not heard back from EPA on that response. The LWG believes that a final QAPP is not required. Need EPA agreement that this final QAPP is not required.	
Hydro/Sed Modeling			
<i>Phase 2 Hydrodynamic Re-calibration Report</i>	May 2009	Submitted 5/7/2009; EPA comments received 7/22/2009	
Groundwater Pathway			
<i>Draft Round 2 Groundwater Pathway Assessment Sampling and Analysis Plan</i>	4/22/2005	Submitted 4/22/2005; EPA comments received 6/3/2005	
<i>Round 2 Groundwater Pathway Assessment Sampling and Analysis Plan - Response to EPA Comments</i>	TBD	Outstanding issues to be addressed in GW Appendix to Draft RI Report.	
<i>Revised Round 2 Groundwater Pathway Assessment Sampling and Analysis Plan (including Appendix A - Site Summaries and Appendix B - Pilot Study Data Report)</i>	TBD	Outstanding issues to be addressed in GW Appendix to Draft RI Report.	

Deliverable¹	Submittal Deadline²	Status/Comments	EPA Comments Target Date
<i>Round 2 FSP for Sampling of Shoreline Seeps at Human Use Beaches</i>	4/29/2005	Submitted 4/29/2005; EPA comments received 6/10/2005	
<i>Revised Round 2 FSP for Sampling of Shoreline Seeps at Human Use Beaches</i>	No longer needed	The only seep determined to pose a potentially complete exposure pathway is discharge from Outfall 22B. The existing data from Outfall 22B include the upland COIs and meet the data quality requirements for risk evaluation (Category 1/QA2). Based on the Round 2 Report evaluations, no additional seep data are needed. Therefore, this FSP is no longer needed.	
<i>Revised Round 2 Groundwater Pathway Assessment SAP Attachment 2: Transition Zone Water FSP</i>	3/27/2006	Redline version submitted 3/27/2006; EPA needs to provide final approval of this FSP. This revised FSP was prepared and submitted after the associated field work was completed.	4/28/2006
<i>Revised Round 2 Groundwater Pathway Assessment SAP Attachment 3: Supplement to QAPP Addendum 3</i>	10/7/2005	Submitted 10/7/2005: Conditional approval of proposed changes to the QAPP addendum received from EPA on 9/30/2005. EPA needs to provide final approval of this QAPP. Approval to conduct sampling was provided by EPA on 9/30/2005.	
<i>Revised Transition-Zone Water FSP Addendum 1 Sampling Plans for ExxonMobil, Siltronic, Gasco, and Arkema</i>	3/27/2006	Submitted 3/27/2006. EPA needs to provide final approval of this FSP. Approval to conduct sampling was provided by EPA on 9/30/2005. This revised FSP was prepared and submitted after the associated field work was completed.	
<i>Revised Transition-Zone Water FSP Addendum 2</i>	3/27/2006	Submitted 3/27/2006. EPA needs to provide final approval of this FSP. Approval to conduct sampling was provided by EPA on 10/13/2005. This revised FSP was prepared and submitted after the associated field work was completed.	

Deliverable¹	Submittal Deadline²	Status/Comments	EPA Comments Target Date
Natural Attenuation			
<i>Step 2 Natural Attenuation Evaluation Report</i>	No longer needed		
Tech Memos			
Revised TRV Selection TM	10/23/2004	Submitted; EPA comments received 3/18/2005. On 6/10/2005, EPA directed the LWG to submit the final TRV Selection TM with the PRE. The final TRV Selection TM was submitted as an appendix to the 9/9/2005 PRE.	
Second Revision Preliminary Risk Evaluation Approach TM	1/7/2005	Submitted; EPA comments received 3/4/2005. On 6/10/2005, EPA directed the LWG to submit the final PRE approach TM with the PRE. The final PRE Approach was submitted as an appendix to the 9/9/2005 PRE.	
Comprehensive ERA Approach TM	6/27/2004	Submitted; EPA comments received 10/1/2004	
Revised Comprehensive ERA Approach TM	TBD	In a 1/11/2006 meeting with EPA, the LWG proposed deleting this deliverable. The LWG has not heard back from EPA on this proposal. Need EPA agreement that this deliverable is no longer needed.	
Process for Derivation of PRGs TM	1/20/2005	Submitted; EPA comments received 6/30/2006; a revised tech memo is not required.	3/21/2005
<i>Draft Approach to Determining Background for the Portland Harbor Superfund Site</i>	3/3/2006	Submitted 3/3/2006; EPA comments received 6/5/2006; revised tech memo required.	5/2/2006
<i>Revised Approach to Determining Background for the Portland Harbor Superfund Site</i>	7/20/2006	The revised approach to determining background for the Portland Harbor Superfund Site will be provided in the Draft RI Report	

Deliverable¹	Submittal Deadline²	Status/Comments	EPA Comments Target Date
<i>Process for Delineating the Extent of Contamination Upstream and Downstream of the ISA</i>		The approach for Delineating the Extent of Contamination Upstream and Downstream of the ISA will be provided in the Draft RI Report	
<i>COPC Selection Interim Deliverable</i>	~1/23/2006	In a 1/11/2006 meeting with EPA, the LWG proposed deleting this deliverable. The LWG has not heard back from EPA on this proposal. Need EPA agreement that this deliverable is no longer needed.	
ECOLOGICAL RISK ASSESSMENT			
Ecological Preliminary Risk Evaluation (PRE)	9/9/2005	Submitted 9/9/2005; EPA comments received 4/28/2006, a revised PRE is not required	11/8/2005
<i>Round 2 Benthic Assessment Interpretation Report</i>	3/17/2006	Submitted 3/17/2006; EPA comments received 7/6/2006	5/16/2006
<i>Food Web Modeling Report: Evaluating Trophic Trace and the Arnot and Gobas Models for Application to the Portland Harbor Superfund Site</i>	11/4/2005	Submitted 11/4/2005; EPA comments received 3/10/2006	1/3/2006
<i>Revised Ecological Water Screening Levels</i>	5/26/2006	Submitted 5/25/2006; directive EPA comments received 9/15/2006, and a correction to the xylene AWQC on 9/27/06. Additional revisions were submitted on 10/13/2006.	7/9/2006
Feasibility Study			
Literature Survey of Treatability Studies	October 2007	Submitted 10/31/2007. EPA comments received 2/15/08. A revised deliverable is not required, EPA comments indicated that they should be addressed in the FS.	Jan-08
<i>Round 3B (FS) Side-scan Sonar Data Report</i>	September 2008	Submitted 5/18/2009	
<i>Treatment Technologies Screening Table</i>	Early May 2009	Submitted 6/5/2009; EPA comments received 7/9/2009	7/6/2009

Deliverable¹	Submittal Deadline²	Status/Comments	EPA Comments Target Date
<i>Screening of Disposal Facilities for the Feasibility Study Memorandum</i>	Mid May 2009	Submitted 6/18/2009; EPA comments received 7/10/2009	7/2/2009
<i>Early Preliminary Remediation Goals (PRGs)</i>	Late March 2009	Submitted 3/27/2009	
<i>Benthic Toxicity AOPCs Check In Materials</i>	September 2010	Submitted 9/07/2010	
General Field/Data/RI Reporting			
<i>Validated Analytical Results</i>	90 days following completion of each sampling activity		
Comprehensive Round 2 Site Characterization Summary and Data Gaps Analysis Report	2/21/2007	Submitted 2/21/2007. EPA comments on Sections 1-9 and Appendices A, B, C, D, F, and G received 1/15/08; comments on Section 10 received 3/20/08; comments on Section 11 received 5/16/08; comments on Appendix E received 8/8/08. This document was never intended to be revised or approved by EPA; comments will be addressed in the Draft RI Report.	
<i>Draft Sediment Mobility Testing Data Report</i>	August 2009	Submitted 8/11/2009	EPA comments not anticipated
Draft Baseline Ecological Risk Assessment Report	Early September 2009	Submitted 9/2/2009 Preliminary EPA comments received 12/23/09. EPA comments received 07/16/2010. EPA benthic approach comments received 09/27/2010.	11/2/2009
Draft Baseline Human Health Risk Assessment Report	Late September 2009	Submitted 9/23/2009 Preliminary EPA comments received 12/23/09. EPA comments received 07/16/2010.	11/23/2009

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Draft Remedial Investigation Report	Late October 2009	Submitted 10/27/2009 EPA comments received 07/16/2010	12/27/2009
<i>Benthic Toxicity Reanalysis Technical Memorandum</i>	Mid November 2009	Submitted 11/13/2009 EPA benthic approach comments received 09/27/2010.	01/13/2009
<i>Supporting Electronic Information for Draft Benthic BERA</i>	November 2009	Submitted 11/19/2009	01/19/2010
STORMWATER			
<i>Stormwater Loading Check-in Materials</i>	2/1/2009	Submitted 2/18/2009; EPA comments received 5/6/2009	
<i>Revised Stormwater Loading Calculation Methods</i>	April 2010	Submitted 04/30/2010	6/30/2010
SEDIMENT			
<i>Round 3B Field Sampling Plan: Sediment Sampling and Benthic Toxicity Testing</i>		Submitted 5/4/2007; EPA comments received 7/25/07. Superseded by the 11/5/2007 R3B Comprehensive Sediment & Bioassay Testing FSP.	
<i>Upriver and Multnomah Channel Sediment Evaluation and Field Sampling Plan Technical Approach</i>		Submitted 5/25/2007; EPA comments received 10/11/07. Superseded by the 11/5/2007 R3B Comprehensive Sediment & Bioassay Testing FSP.	
<i>Draft Round 3B Surface and Core Sediment FSP Preliminary Technical Memorandum</i>		Submitted 5/25/2007; EPA comments received 8/9/07. Superseded by the 11/5/2007 R3B Comprehensive Sediment & Bioassay Testing FSP.	
<i>Draft Round 3B Erosion Core Sediment FSP Technical Memorandum</i>	August 2007	Submitted 8/29/07; EPA comments received 10/11/07. Superseded by the 11/5/2007 R3B Comprehensive Sediment & Bioassay Testing FSP.	

Deliverable¹	Submittal Deadline²	Status/Comments	EPA Comments Target Date
<i>Round 3B QAPP Addendum 10 for Sediment Sampling</i>	November 2007	Submitted 12/17/2007. Need EPA approval of this QAPP Addendum.	
FATE & TRANSPORT			
<i>Draft Chemical Fate & Transport Model Development and Data Gaps Identification Report</i>	July 2007	Submitted 7/20/2007; EPA comments received 10/15/07. LWG response to comments submitted 1/8/2008.	
<i>F&T Surface Sediment FSP – Addendum to 3B Sediment FSP</i>	December 2007	Submitted 12/10/2007; EPA comments received 1/2/08. 1/16/08 LWG agreed with EPA not to perform the sampling. Need EPA agreement that this deliverable is no longer needed.	
<i>Draft Bioaccumulation Modeling Report</i>		Submitted 7/27/2009	
CULTURAL RESOURCES			
<i>Draft Cultural Resource Survey Report</i>	12/16/2005	Submitted 12/16/2005	2/14/2006; EPA comments not time-critical at this point in the project

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Only deliverables due within the next four months are shown.

Deliverable completed and approved by EPA.

Deliverable submitted to EPA and its partners.

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